

Marc A. Lieberman, Esq. (SBN 157318)
Alan W. Forsley, Esq. (SBN 180958)
FLP LAW GROUP, LLP
1875 Century Park East, Suite 2230
Los Angeles, California 90067-2523
Telephone: (310) 284-7350
Facsimile: (310) 432-5999
alan.forsley@flpllp.com

Attorneys for Creditor Italian Luxury Group, LLC

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re :

CRESTLLOYD, LLC,

Debtor.

) **CASE NO. 2:21-bk-18205-DS**

) Chapter 11

) **NOTICE OF LIEN ON CLAIM**
) **NUMBER 22-1 OF CREDITOR NILE**
) **NIAMI**

TO DEBTR-IN-POSSESSION CRESTLLOYD, LLC, AND ALL PARTIES IN
INTEREST, PLEASE TAKE NOTICE THAT, pursuant to California Code of Civil Procedure
("CCP") § 708.410, judgment creditor Italian Luxury Group, LLC ("**ILG**") hereby notices a lien
on the proof of claim filed by creditor Nile Niami in this bankruptcy case.

On September 11, 2024, ILG obtained a judgment against Nile Niami in the amount of
\$3,159,738.56 (the "**Judgment**"). Attached as **Exhibit "1"** is a certified copy of the Judgment.

1 No amount of that judgment has been paid. The current amount of the judgment including interest
2 exceeds \$3,159,738.56. This Notice of Lien attaches to any amounts Nile Niami will receive on
3 his Claim No. 22-1 in the amount of \$44,409,682.98.

4 Pursuant to CCP §§ 708.410 & 708.420, ILG files with this pleading a Notice of Lien
5 attached as **Exhibit "2"** indicating a balance due on the judgment of \$3,159,738.56 as of
6 September 11, 2024 with interest continuing to accrue at the judgment rate of 10% per annum.

7
8
9 DATED: January 14, 2025

FLP Law Group, LLP

10
11 By:

Marc A. Lieberman, Esq.

Alan W. Forsley, Esq.

Attorneys for Judgment Creditor Italian Luxury
Group, LLC

EXHIBIT 1

JUD-100

Electronically Received 08/13/2024 04:17 PM

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): Nick M Campbell, SBN 185590 BUILDERS LAW GROUP, INC. 9767 Via Roma Burbank CA 91504 TELEPHONE NO.: 818-381-5716 FAX NO. (Optional): 818-450-0542 E-MAIL ADDRESS (Optional): nick@builderslawgroup.com ATTORNEY FOR (Name): Italian Luxury Group, LLC		FOR COURT USE ONLY FILED Superior Court of California County of Los Angeles 09/11/2024 David W. Slayton, Executive Officer / Clerk of Court By: <u>S. Luquano</u> Deputy					
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Stanley Mosk Courthouse							
PLAINTIFF: ITALIAN LUXURY GROUP, LLC DEFENDANT: NILE NIAMI, 10701 BELLAGIO ROAD, LLC, etc. et al.							
JUDGMENT <table><tr><td><input type="checkbox"/> By Clerk</td><td><input checked="" type="checkbox"/> By Default</td><td><input type="checkbox"/> After Court Trial</td></tr><tr><td><input checked="" type="checkbox"/> By Court</td><td><input type="checkbox"/> On Stipulation</td><td><input type="checkbox"/> Defendant Did Not Appear at Trial</td></tr></table>			<input type="checkbox"/> By Clerk	<input checked="" type="checkbox"/> By Default	<input type="checkbox"/> After Court Trial	<input checked="" type="checkbox"/> By Court	<input type="checkbox"/> On Stipulation
<input type="checkbox"/> By Clerk	<input checked="" type="checkbox"/> By Default	<input type="checkbox"/> After Court Trial					
<input checked="" type="checkbox"/> By Court	<input type="checkbox"/> On Stipulation	<input type="checkbox"/> Defendant Did Not Appear at Trial					
		CASE NUMBER: 24STCV02198					

JUDGMENT

1. ☒ **BY DEFAULT**

- Defendant was properly served with a copy of the summons and complaint.
- Defendant failed to answer the complaint or appear and defend the action within the time allowed by law.
- Defendant's default was entered by the clerk upon plaintiff's application.
- ☐ Clerk's Judgment (Code Civ. Proc., § 585(a)). Defendant was sued only on a contract or judgment of a court of this state for the recovery of money.
- ☒ Court Judgment (Code Civ. Proc., § 585(b)). The court considered
 - ☐ plaintiff's testimony and other evidence.
 - ☒ plaintiff's written declaration (Code Civ. Proc., § 585(d)).

2. ☐ **ON STIPULATION**

- Plaintiff and defendant agreed (stipulated) that a judgment be entered in this case. The court approved the stipulated judgment and
- ☐ the signed written stipulation was filed in the case.
- ☐ the stipulation was stated in open court ☐ the stipulation was stated on the record.

3. ☐ **AFTER COURT TRIAL.** The jury was waived. The court considered the evidence.

- The case was tried on (date and time):
before (name of judicial officer):
- Appearances by:

<input type="checkbox"/> Plaintiff (name each):	<input type="checkbox"/> Plaintiff's attorney (name each):
(1)	(1)
(2)	(2)
<input type="checkbox"/> Continued on Attachment 3b.	
<input type="checkbox"/> Defendant (name each):	<input type="checkbox"/> Defendant's attorney (name each):
(1)	(1)
(2)	(2)
<input type="checkbox"/> Continued on Attachment 3b.	
- ☐ Defendant did not appear at trial. Defendant was properly served with notice of trial.
- ☐ A statement of decision (Code Civ. Proc., § 632) ☐ was not ☐ was requested.

Page 1 of 2

PLAINTIFF: ITALIAN LUXURY GROUP, LLC	CASE NUMBER: 24STCV02198
DEFENDANT: NILE MIAMI, 10701 BELLAGIO ROAD, LLC, etc. et al.	

JUDGMENT IS ENTERED AS FOLLOWS BY: ☒ THE COURT ☐ THE CLERK

4. ☐ Stipulated Judgment. Judgment is entered according to the stipulation of the parties.

5. Parties. Judgment is

a. ☒ for plaintiff (name each):
ITALIAN LUXURY GROUP, LLC

c. ☐ for cross-complainant (name each):

and against defendant (names):
SEE ATTACHMENT "A"

and against cross-defendant (name each):

☒ Continued on Attachment 5a.

☐ Continued on Attachment 5c.

b. ☐ for defendant (name each):

d. ☐ for cross-defendant (name each):

6. Amount.

a. ☒ Defendant named in Item 5a above must pay plaintiff on the complaint:

c. ☐ Cross-defendant named in Item 5c above must pay cross-complainant on the cross-complaint:

\$2,407,595.15		
(1)	<input checked="" type="checkbox"/> Damages	\$9,607,501.15
(2)	<input checked="" type="checkbox"/> Prejudgment interest at the annual rate of 12 %	\$725,041.48
(3)	<input checked="" type="checkbox"/> Attorney fees	\$25,965.91
(4)	<input checked="" type="checkbox"/> Costs	\$1,136.02
(5)	<input type="checkbox"/> Other (specify):	\$
		\$3,159,738.56
(6)	TOTAL	\$10,359,734.56

(1)	<input type="checkbox"/> Damages	\$
(2)	<input type="checkbox"/> Prejudgment interest at the annual rate of %	\$
(3)	<input type="checkbox"/> Attorney fees	\$
(4)	<input type="checkbox"/> Costs	\$
(5)	<input type="checkbox"/> Other (specify):	\$
(6)	TOTAL	\$

b. ☐ Plaintiff to receive nothing from defendant named in item 5b.

☐ Defendant named in item 5b to recover costs \$
☐ and attorney fees \$

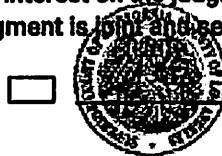
d. ☐ Cross-complainant to receive nothing from cross-defendant named in item 5d.

☐ Cross-defendant named in item 5d to recover costs \$
☐ and attorney fees \$

7. ☒ Other (specify):

Plaintiff is also entitled to post-judgment interest on the judgment amount at the statutory rate; and costs of collection, including attorney's fees. Judgment is joint and several as to all defendants.

Date: 09/11/2024



JUDICIAL OFFICER

Date:

☐ Clerk, by Daniel S. Murphy / Judge, Deputy

(SEAL)

CLERK'S CERTIFICATE (Optional)

I certify that this is a true copy of the original judgment on file in the court.

Date:

Clerk, by _____, Deputy

MC-025

SHORT TITLE: Italian Luxury Group, LLC v. Nile Miami, et al.	CASE NUMBER: 24STCV02198
--	------------------------------------

ATTACHMENT (Number): A

(This Attachment may be used with any Judicial Council form.)

5.a. for plaintiff (name each): ITALIAN LUXURY GROUP, LLC and against defendant (names):

NILE MIAMI,

10701 BELLAGIO ROAD, LLC, a California limited liability company;

CARCASSONNE FINE HOMES, LLC, a California limited liability company;

1369 LONDONDERRY ESTATE, LLC, a California limited liability company;

JULIAMI ART VENTURES, LLC, a California limited liability company;

MARBELLA CONSTRUCTION, INC., a California corporation.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 3 of 3

(Add pages as required)

PROOF OF SERVICE (C.C.P. §1013a, 2015.5)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I, Emily M. Campbell, am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 9767 Via Roma, Burbank, CA 91504.

On Tuesday, August 13, 2024, I served the foregoing document entitled:

JUDGMENT

☐

by placing the original copies thereof enclosed in sealed envelopes, addressed as follows

☒

by placing the true copies thereof enclosed in sealed envelopes, addressed as follows:

☐

by serving a copy electronically upon the following:

SEE ATTACHED SERVICE LIST

☒

BY MAIL I caused such envelope(s) to be deposited in the County of Los Angeles, State of California, with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collecting and processing correspondence for mailing. Under that practice it would be deposited with the United States Postal Service on that same day with postage thereon fully prepaid.

☐

BY ESERVICE I caused such documents to be electronically filed through the OneLegal portal, and to be e-served on the above named participants.

☐

BY FACSIMILE TRANSMISSION I caused a true copy of the foregoing document to be transmitted on this date to each of the parties above at the facsimile machine telephone number listed above and as last given by that person on any document filed in this action and served upon this office.

☐

BY HAND DELIVERY I placed a true copy of the foregoing document in a sealed envelope addressed to the parties identified above, and caused such a package to be hand delivered to an authorized courier or driver for hand delivery.

☐

BY EMAIL TRANSMISSION I caused a true copy of the foregoing document to be transmitted on this date to each of the parties above at the email address listed above and as last given by that person on any document filed in this action and served upon this office.

☐

BY OVERNIGHT DELIVERY I caused a true copy of the foregoing document, enclosed in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses listed above. I place the envelope or package for collection and overnight delivery at an office or regularly utilized drop box of the overnight delivery carrier.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed: August 13, 2024

Emily M. Campbell

Name


Signature

SERVICE LIST

Nile Miami 1110 North Virgil Ave., Unit 362 Los Angeles, CA 90029	10701 Bellagio Road, LLC REGISTERED AGENT FOR SERVICE OF PROCESS: LEGALZOOM.COM 101 N. Brand Blvd., 11 th Floor Glendale, CA 91203
Carcassonne Fine Homes, LLC REGISTERED AGENT FOR SERVICE OF PROCESS: LEGALZOOM.COM 101 N. Brand Blvd., 11 th Floor Glendale, CA 91203	1369 Londonderry Estate, LLC REGISTERED AGENT FOR SERVICE OF PROCESS: LEGALZOOM.COM 101 N. Brand Blvd., 11 th Floor Glendale, CA 91203
Juliami Art Ventures, LLC REGISTERED AGENT FOR SERVICE OF PROCESS: LEGALZOOM.COM 101 N. Brand Blvd., 11 th Floor Glendale, CA 91203	Marbella Construction, Inc. REGISTERED AGENT FOR SERVICE OF PROCESS: LEGALZOOM.COM 101 N. Brand Blvd., 11 th Floor Glendale, CA 91203

EXHIBIT 2

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): Marc A. Lieberman (SBN 157318) Alan W. Forsley (SBN 180958) FLP Law Group, LLP 1875 Century Park East, Suite 2030 Los Angeles, CA 90067 alan.forsley@flpllp.com ATTORNEY FOR LIEN CLAIMANT:	TELEPHONE NO.: 310.284.7350	FOR COURT USE ONLY
NAME OF COURT: United States Bankruptcy Court STREET ADDRESS: 255 E. Temple Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central District of CA, Los Angeles Division		
PLAINTIFF: In re Crestlloyd, LLC DEFENDANT:		
NOTICE OF LIEN (Attachment—Enforcement of Judgment)		
		CASE NUMBER: 2:21-bk-18205-DS

ALL PARTIES IN THIS ACTION ARE NOTIFIED THAT

1. A lien is created by this notice under
 - a. ☐ Article 3 (commencing with section 491.410) of Chapter 11 of Title 6.5 of Part 2 of the Code of Civil Procedure.
 - b. ☐ Article 5 (commencing with section 708.410) of Chapter 6 of Title 9 of Part 2 of the Code of Civil Procedure.
2. The lien is based on a
 - a. ☐ right to attach order and an order permitting the creation of a lien (copies attached).
 - b. ☒ money judgment.
3. The right to attach order or the money judgment is entered in the following action:
 - a. Title of court (specify): Los Angeles County Superior Court
 - b. Name of case (specify): Italian Luxury Group, LLC v. Nile Miami et al.
 - c. Number of case (specify): 24STCV02198
 - d. ☒ Date of entry of judgment (specify): September 11, 2024
 - e. ☐ Dates of renewal of judgment (specify):
4. The name and address of the judgment creditor or person who obtained the right to attach order are (specify):
N/A
5. The name and last known address of the judgment debtor or person whose property is subject to the right to attach order are (specify):
Nile Miami, 1110 North Virgil Ave., Unit 362, Los Angeles, CA 90029
6. The amount required to satisfy the judgment creditor's money judgment or to secure the amount to be secured by the attachment at the time this notice of lien is filed is
\$ 3,159,738.56
7. The lien created by this notice attaches to any cause of action of the person named in item 5 that is the subject of this action or proceeding and to that person's rights to money or property under any judgment subsequently procured in this action or proceeding.
8. No compromise, dismissal, settlement, or satisfaction of this action or proceeding or any of the rights of the person named in item 5 to money or property under any judgment procured in this action or proceeding may be entered into by or on behalf of that person, and that person may not enforce any rights to money or property under any judgment procured in this action or proceeding by a writ or otherwise, unless one of the following requirements is satisfied:
 - a. the prior approval by order of the court in this action or proceeding has been obtained;
 - b. the written consent of the person named in item 4 has been obtained or that person has released the lien; or
 - c. the money judgment of the person named in item 4 has been satisfied.

NOTICE The person named in item 5 may claim an exemption for all or any portion of the money or property within 30 days after receiving notice of the creation of the lien. The exemption is waived if it is not claimed in time.

Date: January 14, 2025


(TYPE OR PRINT NAME)


(SIGNATURE OF LIEN CLAIMANT OR ATTORNEY)

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

FLP LAW GROUP LLP 1875 Century Park East, Suite 2230, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF LIEN ON CLAIM NUMBER 22-1 OF CREDITOR NILE NIAMI** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

I. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **January 14, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

II. **SERVED BY UNITED STATES MAIL**:

On (*date*) January 14, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Nile Niami

Hamid R. Rafatjoo/ Raines Feldman LLP
1800 Avenue of the Stars, 12th Floor
Los Angeles, CA 90067

Nile Niami

1110 North Virgil Ave., Unit 362
Los Angeles, CA 90029

**LEGALZOOM.COM, Registered Agent for
10701 Bellagio Road, LLC; Carcassonne Fine
Homes, LLC, 1369 Londonderry Estate, LLC;
Juliami Art Ventures, LLC; Marbella Construction,
Inc.
101 N. Brand Blvd., 11th Floor
Glendale, CA 91203**

☐ Service information continued on attached page

III. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**

(*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as

follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 14, 2025 ANDREA HANSEN
Date Printed Name


Signature

ADDITIONAL SERVICE LIST
VIA ECF

- **Kyra E Andrassy** kandrassy@raineslaw.com, bclark@raineslaw.com;jfisher@raineslaw.com
- **Todd M Arnold** tma@lnbyg.com
- **Jerrold L Bregman** jlbregman@bg.law, ecf@bg.law
- **Ryan Coy** ryan.coy@saul.com, hannah.richmond@saul.com;Shelly.Guise@saul.com;LitigationDocketing@saul.com
- **Marguerite Lee DeVoll** mdevoll@watttieder.com
- **Karol K Denniston** karol.denniston@squirepb.com, travis.mcroberts@squirepb.com;sarah.conley@squirepb.com;karol-k-denniston-9025@ecf.pacerpro.com
- **Oscar Estrada** oestrada@ttc.lacounty.gov
- **Max Fabricant** mfabricant@lavelysinger.com
- **Danielle R Gabai** dgabai@ecjlaw.com, dgabai@ecf.courtdrive.com;aantonio@ecjlaw.com;dperez@ecjlaw.com
- **Thomas M Geher** tmg@jmbm.com, bt@jmbm.com;tmg@ecf.courtdrive.com
- **David B Golubchik** dbg@lnbyg.com, dbg@lnbyg.com
- **Andrew Goodman** agoodman@andyglaw.com, Goodman.AndrewR102467@notify.bestcase.com
- **Jonathan Gottlieb** jdg@lnbyg.com
- **Robert B Kaplan** rbk@jmbm.com, rbk@ecf.courtdrive.com
- **Jane G Kearn** jkearl@watttieder.com, lharake@watttieder.com
- **Jennifer Larkin Kneeland** jkneeland@watttieder.com
- **Michael S Kogan** mkogan@koganlawfirm.com
- **Marc A Lieberman** marc.lieberman@flpllp.com, addy@flpllp.com, andrea@flpllp.com
- **John W Lucas** jlucas@pszjlaw.com, ocarpio@pszjlaw.com
- **Noreen A Madoyan** Noreen.Madoyan@usdoj.gov
- **John A Moe** john.moe@dentons.com, glenda.spratt@dentons.com;derry.kalve@dentons.com
- **Samuel A Newman** sam.newman@sidley.com, samuel-newman-2492@ecf.pacerpro.com;laefilingnotice@sidley.com
- **Ryan D O'Dea** rodea@shulmanbastian.com, lgauthier@shulmanbastian.com
- **Sharon Oh-Kubisch** sokubisch@swelawfirm.com, gcruz@swelawfirm.com;lgarrett@swelawfirm.com;jchung@swelawfirm.com
- **Hamid R Rafatjoo** hrafatjoo@raineslaw.com, bclark@raineslaw.com;jfisher@raineslaw.com
- **Ronald N Richards** ron@ronaldrichards.com, 7206828420@filings.docketbird.com
- **Joseph M Rothberg** jmr@lnbyg.com, jmr.LNBYG@ecf.inforuptcy.com
- **Victor A Sahn** victor.sahn@gmlaw.com, vsahn@ecf.courtdrive.com;pdillamar@ecf.courtdrive.com;patricia.dillamar@gmlaw.com,Karen.Files@gmlaw.com
- **William Schumacher** wschumacher@winthrop.com, autodocketecf@milbank.com
- **David Seror** dseror@bg.law, ecf@bg.law
- **Zev Shechtman** Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com;hannah.richmond@saul.com;LitigationDocketing@saul.com
- **Lindsey L Smith** lls@lnbyg.com, lls@ecf.inforuptcy.com
- **Howard Steinberg** steinbergh@gtlaw.com, pearsallt@gtlaw.com;NEF-BK@gtlaw.com;howard-steinberg-6096@ecf.pacerpro.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
- **Daniel Wall** dwall@wallinrussell.com
- **Genevieve G Weiner** gweiner@sidley.com, laefilingnotice@sidley.com;genevieve-weiner-0813@ecf.pacerpro.com;psantos@sidley.com
- **Sharon Z. Weiss** sharon.weiss@bclplaw.com, raul.morales@bclplaw.com,REC_KM_ECF_SMO@bclplaw.com,sharon-weiss-7104@ecf.pacerpro.com